

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**



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of the California High Cost Fund B Program.

Rulemaking 06-06-028
(Filed June 29, 2006)

**COMMENTS OF VERIZON REGARDING
CALIFORNIA ADVANCED SERVICES FUND
APPLICATION REQUIREMENTS AND SCORING CRITERIA**

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February 19, 2008

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TABLE OF CONTENTS

	<u>PAGE</u>
I. INTRODUCTION.....	1
II. PROPOSED SCORING CRITERIA USED IN EVALUATING PROPOSED CASF PROJECTS SHOULD BE MODIFIED CONSISTENT WITH THE COMMISSION'S GOALS	1
i. Funds Requested per Potential Customer	2
ii. Speed	2
iii. Service Area	3
iv. Timeliness of Completion of Project	3
v. Pricing.....	3
vi. Guaranteed Pricing Period – one-year minimum	4
III. THE APPLICATION REQUIREMENTS SHOULD BE CLARIFIED	4
IV. CONCLUSION	7

Verizon¹ respectfully submits these comments regarding California Advanced Services Fund (CASF) application requirements and scoring criteria pursuant to the Assigned Commissioner and ALJ's oral ruling at the workshop held on February 7, 2008 in this proceeding.

I. INTRODUCTION

Based on the straw man proposal contained in the Assigned Commissioner Ruling Scheduling Workshop and Providing Template for Review, dated January 23, 2008 (the "ACR"), and the discussions that occurred during the February 7 workshop, Verizon suggests revising the scoring criteria and refining the application requirements. Verizon's suggestions are intended to better focus the evaluation process on the linkage between certain criteria and their relative importance to meeting identified state policies designed to close the digital divide. Verizon also suggests that additional specification be required in individual applications to ensure that the review and evaluation process proceeds smoothly.

II. PROPOSED SCORING CRITERIA USED IN EVALUATING PROPOSED CASF PROJECTS SHOULD BE MODIFIED CONSISTENT WITH THE COMMISSION'S GOALS.

The scoring variables and formulas proposed by the ACR should be significantly modified to better align them with the Commission's policy goals to allocate funds to projects "expected to provide the greatest broadband deployment at affordable rates, providing the transmission speeds we have designated."² As drafted, the six scoring variables provide insufficient guidance for the Commission to evaluate among individual projects. For example, the

¹ The Verizon affiliates submitting these comments include Bell Atlantic Communications, Inc., d/b/a Verizon Long Distance (U-5732-C), MCI Communications Services, Inc. d/b/a Verizon Business Services (U-5378-C), MCI Metro Access Transmission Services, d/b/a Verizon Access Transmission Services (U-5253-C), TTI National, Inc., d/b/a Verizon Business Services (U-5403-C), Teleconnect Long Distance Services & Systems Company, d/b/a Telecom*USA (U-5152-C), Verizon California Inc. (U-1002-C), and Verizon Select Services, Inc. (U-5494-C).

² D.07-12-054, mimeo at 32.

proposed scoring criteria encourage higher priced broadband service. The proposed criteria do this by assigning 50 points to cost per potential customer, but only 5 points to the price per MBPS variable. This proposed scoring encourages carriers to lower a project's cost per potential customer, and increase the price. This would raise the project score overall and make it more likely that the project would be funded.

Similarly, the high point weighting of cost per potential customer encourages projects with lower broadband speeds. Lower broadband speeds may drastically increase the potential customer base (*i.e.*, slower speeds can be offered over longer loop lengths, so the project would generate more potential customers), and thereby increase scoring through the cost per potential customer variable. Given the weighting of this variable, it would more than offset the decrease in the speed variable and the price per MBPS variable. While the tradeoffs between these variables must be judged by carriers against real world business case constraints, the Commission's scoring of projects may drive the components of projects being submitted. Verizon does not propose to make the scoring more complex, but recommends the following adjustments to the scoring variables and the underlying formulae to better tailor them to Commission goals.

i) Funds Requested per Potential Customer

The Funds Request per Potential Customer variable should be reduced from 50% of the total score to 40%. Verizon agrees that this variable should be a primary consideration in evaluating proposed projects. However, as discussed above, weighting this variable too high may encourage submission of projects and allocation of funding that detracts from the Commission's goals.

ii) Speed

Because the benchmark broadband speed of 3 MBPS download and 1 MBPS upload is an important component of the CASF, the speed variable point score should be increased from 15 points to 25 points of the total 100 possible point score. Carriers that meet the benchmark (*i.e.*, on a combined basis,

projects with speeds exceeding 90% of 4 MBPS or a combined 3.6 MBPS) would be ranked based on the formula as it is currently proposed. Since the formula uses the square root of the average speed increase to express the diminishing return of value associated with increasing speed, it also reduces any point penalty for projects with speeds significantly below the benchmark. Verizon suggests modifying the formula such that projects with combined speeds below this threshold would have 25%, 50% or 75% score reductions based on the percentage of the 4 MBPS threshold met. Thus, if a project with a 3 MBPS combined offering would have a score of 16 per the formula, a 25% reduction, *i.e.*, $(4-3)/4=25\%$, would be applied so that project would receive 12 points for the speed variable.

iii) Service Area

The service area variable, which is currently the square mileage of the proposed project, should be revised to more closely represent a density variable by utilizing the potential customers per square mile with the lowest density projects receiving the highest ranking. Since cost per potential customer is generally higher as density decreases, this variable will then provide a density point value to rank projects with otherwise similar costs per potential customer. For example, if two projects both received 32 points from the funds requested per potential customer variable, the more rural project would receive more points from this density variable. Also, Verizon recommends that total points for this variable be reduced slightly from 15 points to 10 points.

iv) Timeliness of Completion of Project

Verizon recommends eliminating this scoring variable since the overall timeframe is already limited to 24 months.

v) Pricing

The Price per MBPS variable value should be increased to 25 points from 5 points currently. As currently proposed, the pricing variable is largely

independent from the other scoring criteria (e.g., the price per MBPS does not impact the potential subscribership of the project). Therefore, a low cost project with a high priced service offering may expand availability, but the high price would discourage adoption. At the current point value, a project with an end-user price per MBPS that is significantly higher than other projects would only be slightly penalized in the evaluation process. At 25 points, however, the pricing variable provides better linkage to the overall project evaluation. Projects that offer superior or inferior price per MBPS will be rewarded or penalized accordingly.

vi) Guaranteed Pricing Period – one-year minimum

Verizon recommends eliminating the guaranteed pricing period as a scoring variable.³ As noted at the workshop, since construction may take 24 months, the period in question would occur after the one-year guarantee ends in 2011. Attempting to provide points for a pricing commitment made in a mid-2008 application for a period beyond 2011 is inconsistent with normal business practices and unrealistic.

III. THE APPLICATION REQUIREMENTS SHOULD BE CLARIFIED

The data provided by applicants will first and foremost be utilized by the Commission to evaluate projects for funding. The data, however, also will be utilized for two other purposes. First, it will identify CBGs unserved by broadband so that interested parties can respond to proposals within 30 business days. Second, interested parties would use this CBG list to submit a counterproposal within 45 days. Because of the potential volume of projects that could be submitted and the time considerations noted above, the Commission should provide a template with the application requirements, when they are finalized, for all the non-ArcGIS related material so that format issues are

³ However, Verizon is not advocating that the 12 month pricing guarantee period be eliminated as a funding requirement.

eliminated and Commission staff can produce the necessary public information to the website and start evaluating the projects.

The February 7 CASF workshop clarified a number of issues with regard to the application requirements. The following are specific requirements where further detail could be beneficial:

Item 1 – Broadband infrastructure within 100 miles of the proposed project.

Certain broadband providers—those that obtain a state-issued video franchise—already submit broadband subscribership information and data about homes passed at the census tract level to the Commission. For DIVCA providers, the Commission should allow applicants to simply affirm that data in compliance with this requirement has already been provided under DIVCA requirements.

Item 2 – Description of proposed broadband project plan

If the Commission retains a scoring variable for size in terms of square miles covered by the proposed project, the Commission should clarify that it should be included with the response to item 2.

At the workshop, Verizon briefly addressed the situation where an inter-office transport route is required to provision DSL, and the transport would be shared across multiple projects in the neighboring areas. Because of the shared nature of the transport costs, all of the associated projects would need to be considered as a package. Under this approach, approval of a single project that covers contiguous CBGs would be dependent on approval of other projects that share the common transport costs. Verizon suggests that where a project consists of multiple unserved areas, linked because of a common transport requirement, the applicant would identify each group of contiguous CBGs, or applicable portions of a CBG, that make up the separate unserved areas and provide the rationale for linking the areas in a single project for CASF funding.

Item 4 – Basis for asserting a project is unserved

At the workshop, parties noted that the appendix to the Broadband Taskforce Report, which lists communities unserved by wireline broadband, was very helpful in responding to this requirement. Applicants can easily list those unserved communities having latitude and longitude coordinates contained within the proposed project. However, the analysis of wireless broadband availability is currently more difficult because wireless maps and project maps would have to be compared. Therefore, Verizon supports making available a list similar to the wireline list of unserved communities to enable a more objective response to this requirement.

Item 5 – Estimated number of potential broadband subscribers

The basis for estimating the number of potential broadband subscribers should be sourced from data outside the applicant's control. Because this element is the denominator in the cost per potential scoring variable, and this variable is the most influential component in the proposed scoring criteria, an applicant's ability to unfairly influence the scoring should be constrained. Two potential sources are household units and occupied households. The ratio between the two varies greatly in more rural CBGs, ranging from a vacancy rate of 25% in some CBGs to as low as 5% in others. Since only occupied households would subscribe to broadband when it is offered, Verizon recommends that occupied households for all the CBGs in a proposed project be the starting point for estimating potential broadband subscribers.

Item 8 – Performance Bond

A performance bond may prove an unnecessary expense given the other protections built into the CASF process. First, the applicant is putting up a majority of the funds for the proposed project, which demonstrates financial strength. Second, the CASF payments are only made at preset construction milestones and only after the applicant submits documentation that construction has progressed and expenditures have occurred. Third, ten percent of each

progress payment is being withheld. A bond to guarantee satisfactory completion of a project is unnecessary given these other safety features, and only adds to applicant expense.

Should the Commission determine, despite these other safeguards, that a performance bond is required for all applicants, Verizon agrees with the clarification discussed at the workshop that applicants agree to obtain a Performance Bond on commencement of the project.

The scope of the performance bond requirement, however, was not addressed. Unless the applicant is inexperienced, *e.g.*, making its initial entry into the broadband market, the purpose of the bond is to ensure completion of the broadband project construction under the parameters of the CASF. A performance bond should not be required for continued operation in the project areas.

Item 9 – Proposed recurring price per MBPS

Because this element is used as a scoring variable, an applicant could reduce the recurring price to improve the project score and merely increase the non-recurring charge to make-up the difference. Alternately, since broadband offerings most often require a router or some other type of hardware, the applicant could shift a portion of the recurring price to be recovered from the charge for the hardware. Accordingly, Verizon recommends that the price include all revenues the applicant would receive from a subscriber over the course of 12 months, expressed as a monthly average. An applicant's method of pricing the various components of the broadband offering would not then influence the scoring variable.

IV. CONCLUSION

Verizon appreciates the opportunity to submit these additional comments and urges the modification to the scoring variables and application requirements as described above to assist the CASF project evaluation process.

February 19, 2008

Respectfully submitted,

/s/

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CERTIFICATE OF SERVICE

I hereby certify that: I am over the age of eighteen years and not a party to the within entitled action; my business address is 711 Van Ness Avenue, Suite 300, San Francisco, California 94102; I have this day served a copy of the foregoing, **COMMENTS OF VERIZON REGARDING CALIFORNIA ADVANCED SERVICES FUND APPLICATION REQUIREMENTS AND SCORING CRITERIA** by electronic mail to the assigned ALJ and those who have provided an e-mail address and by U.S. Mail to those who have not, on the service list.

I declare under penalty of perjury that the foregoing is true and correct.
Executed this 19th of February, 2008 at San Francisco, California.

/s/
CHRISTINE BECERRA

R.06-06-028



California Public
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TOP OF PAGE
BACK TO INDEX OF SERVICE LISTS